

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Trevor Frank

Case No. 21-mj-1037

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Sept. 7, 2020 to Sept. 8, 2020 in the county of Berks in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. § 2261A

Offense Description

Cyberstalking

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*s/ Christopher Duncanson**Complainant's signature*

Special Agent Christopher Duncanson, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/15/21*s/ Marilyn Heffley**Judge's signature*City and state: Philadelphia, PA

Honorable Marilyn Heffley, USMJ

Printed name and title

AFFIDAVIT OF FBI SPECIAL AGENT CHRISTOPHER M. DUNCANSON
IN SUPPORT OF ARREST WARRANT

I, Christopher M. Duncanson, a Special Agent with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since September 2004, and am currently assigned to criminal investigations, federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training and everyday work related to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have participated in investigations of persons suspected of violating federal child pornography laws, including Title 18, United States Code, Sections 2261A. I have also participated in various FBI-mandated and other training for the investigation and enforcement of federal statutes prohibiting the production, distribution, and possession of child pornography.

2. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements in this Affidavit are based, in part, on information provided by other investigators, and on my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation.

4. I submit there is probable cause to believe that on or about September 7, 2020 through September 8, 2020, TREVOR JAY FRANK knowingly used a social media site to

coerce a minor female to perform sexual acts and to send images of child pornography, in violation of Title 18, United States Code, Section 2261A, which states "any person who – did knowingly use an interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to another person, in violation of Title 18 U.S.C. § 2261A" is punishable.

BACKGROUND OF THE INVESTIGATION

5. On or about September 8, 2020, an officer with the Anderson, California Police Department received information that a 15-year-old female (MINOR), was being blackmailed for nude photographs. The officer spoke with MINOR and MINOR advised that beginning on or about September 7, 2020 and continuing into September 8, 2020, MINOR received messages via Instagram from a user with a username of "do_it_4_the_money". MINOR did not know the identity of do_it_4_the_money. [D]o_it_4_the_money also sent MINOR a nude image of her breasts which she recognized as her own. MINOR previously shared the image with a friend but did not know how do_it_4_the_money received it. [D]o_it_4_the_money requested that MINOR send additional nude photos of herself and offered her \$100. MINOR advised that when she declined, do_it_4_the_money threatened to spread her topless photo on the Internet, if she blocked him, and he also pressured her to engage in a live video chat.

6. MINOR reported to law enforcement that, on or about n September 7, 2020, MINOR accepted a live Instagram video chat from do_it_4_the_money but did not allow herself to be visible to do_it_4_the_money. Likewise, do_it_4_the_money was not visible on camera, but she heard a male voice. During the call, MINOR heard sounds that made her believe

do_it_4_the_money was masturbating. MINOR was instructed by do_it_4_the_money to accept a call from him later that day and he again threatened to spread the nude photo of MINOR on the Internet if she did not comply.

7. MINOR also reported that, on or about that same day, September 7, 2020, MINOR received several images and a video from do_it_4_the_money that depicted nude, minor girls. MINOR reported that the video depicted what appeared to be an adult male engaged in oral sex with a minor female who MINOR judged to be 5-7 years old. All of the images and the video were sent as disappearing messages.¹

8. MINOR provided a police detective with screenshots of some of these conversations that took place between September 7, 2020 and September 8, 2020. During the conversation, the following exchange between do_it_4_the_money (DI4TM) and MINOR occurred:

do_it_4_the_money: I mean Im being nice about this and said something

do_it_4_the_money: Could have said nothing and just spread them

MINOR: Do you know how much trouble you can get in for that

MINOR: If you decided to spread a minors nudes around

do_it_4_the_money: No I have done it plenty of times

do_it_4_the_money: Usually it goes to friends and family first

9. MINOR later sent nude images of herself to do_it_4_the_money between September 7, 2020 and September 8, 2020 over Instagram. She estimated she sent seven images of her breasts that she took of herself to do_it_4_the_money, all via disappearing messages on

¹ Instagram users can send a disappearing photo or video either as a group or individual message. After someone opens a disappearing photo or video they've received, the message is no longer visible in their inbox. Photos or videos sent using this feature are not retained by Facebook/Instagram.

Instagram. MINOR also engaged in three more video conversations with do_it_4_the_money. During these conversations, they talked about MINOR's age, 15 years old, and MINOR believed she heard him masturbating. MINOR's breasts were exposed during these conversations and her vagina was exposed during at least one video conversation with do_it_4_the_money. [D]o_it_4_the_money instructed MINOR to call him "Daddy" and to say: "Come on this 15-year-old chest."

10. After their last video call, do_it_4_the_money messaged MINOR and again threatened to expose her to her friends and family. He also demonstrated that he knew MINOR's first and last name. MINOR then blocked do_it_4_the_money, deleted her Instagram account, and told a parent what happened.

11. The detective with the Anderson Police Department served a search warrant on Facebook² for information related to do_it_4_the_money's Instagram account. On November 10, 2020, Facebook provided the following subscriber information:

Account Name:	do_it_4_the_money
Name, First Name:	"MoMoney"
Registered Email Address:	qqwwssttrredfgtyh@yahoo.com
Account Creation Date:	07/22/2018
Account Disabled:	09/18/2020
Associated Phone Number:	16108805096

12. Facebook also provided records of conversations between the accounts of do_it_4_the_money and MINOR. These conversations confirmed the content of the screenshots MINOR previously showed the detective. The following conversation took place between

² Facebook owns and operates Instagram.

do_it_4_the_money (DI4TM) and MINOR on September 8, 2020 between 2:58 PM and 3:11 PM

Pacific time:

MINOR: well i'm not sending you anything else. i said one time only

DI4TM: So no more help at all

MINOR: at the beginning i said one time

MINOR: you forced be to do another two times

DI4TM: Basically you wont help me one last time

MINOR: that should be enough

MINOR: yeah because you said that the last two times would be the last time

DI4TM: Hey i will show proof and i deleted our messages you messaged me

DI4TM: Which got me hard

DI4TM: Now please just help me last time so I can go away

MINOR: no. i already helped you enough.

DI4TM: So you wont help me cum quick

MINOR: no

MINOR: i already told you i would do it only once and you've had me do it another two times and both times you said it would be the last time

DI4TM: This is final and last time

DI4TM: For the 500 then we are completely even

MINOR: no, last night was the last time

DI4TM: Just quick

MINOR: no

DI4TM: Final time I promise

MINOR: no

MINOR: i already said no more

DI4TM: Then can I keep what I saved..

MINOR: you saved things?

MINOR: no you can't keep it

MINOR: unless you wanna be charged with keeping child porn

MINOR: delete everything you saved.

DI4TM: I will be fine

MINOR: i'm telling you to delete everything you saved of me

DI4TM: We can make a deal

MINOR: we've already made a deal

DI4TM: You can keep that one it really is sending

DI4TM: But new deal

MINOR: no, no new deals

MINOR: we already made one

MINOR: and that's its

MINOR: it

DI4TM: I'm talking about for the pics and things I saved

MINOR: how much did you save

DI4TM: Enough

DI4TM: To show its all you

MINOR: dude. you said you wouldn't save any of it.

DI4TM: New deal?

MINOR: oh so you're blackmailing anf manipulating me now

MINOR: and

DI4TM: I mean im being nice about this and said something

DI4TM: Could have said nothing and just spread them

MINOR: do you know how much trouble you can get in for that.

MINOR: if you decided to spread a minors nudes around

DI4TM: No i have done it plenty of times

DI4TM: Usually it goes to friends and family first

MINOR: you dont know my friends or family

DI4TM: Look [MINOR's true name]

DI4TM: I do

DI4TM: Even know you are in California

DI4TM: I have all information on you so if you like to make a deal we should

DI4TM: Block me be rude or say no ill just let others know

MINOR: what's the deal then, hmv

13. During the conversation on September 8, 2020 about the images MINOR sent to do_it_4_the_money, MINOR tells do_it_4_the_money that they are "child porn" and that he could be "charged". MINOR also asked for the images to be deleted. [D]o_it_4_the_money responded: "I'll be fine". Later in the conversation, do_it_4_the_money again acknowledges

images were saved by saying: “I’m talking about for the pics and things I saved”. This conversation indicates do_it_4_the_money stated he received and stored images or videos of MINOR.

14. In addition to the images of MINOR, do_it_4_the_money corroborated MINOR’s account of do_it_4_the_money sending her a video depicting child pornography.

[D]o_it_4_the_money asked MINOR “You watch the whole thing” and the video was described.

[D]o_it_4_the_money said “Well he nudded on her face” and also told MINOR: “Thats what i want to do to you badly”. This conversation indicates do_it_4_the_money possessed and sent a video to MINOR consistent with her report of that video to law enforcement.

15. In addition to subscriber information, Facebook provided IP login information for do_it_4_the_money. The following IP addresses had been identified as having been used to login to the do_it_4_the_money account:

- a. **2600:1002:b0c2:0732:8d5e:26b4:6749:c7ea** on September 15, 2020 at 01:53:28 UTC
- b. **2600:1002:b0c2:0732:4480:4c61:a65e:86af** on September 17, 2020 at 01:29:58 UTC
- c. **2600:1002:b0cf:08f6:6539:a980:ed14:d861** on September 17, 2020 at 21:42:01 UTC
- d. **2600:1002:b0ce:d858:1ccb:c25c:c74b:cd25** on September 18, 2020 at 06:22:46 UTC

16. Records received from Verizon Wireless for the IP addresses listed above, law enforcement checks, and Pennsylvania Department of Motor Vehicles records all resolved back to 234 E. Elm Street, Reading, PA 19607.

17. On June 14, 2021, your Affiant applied for and was granted a federal search warrant (21-mj-1027) by United States Magistrate Judge Henry S. Perkin, Eastern District of Pennsylvania, to search the residence at 234 E. Elm Street, Reading, PA 19607.

18. On June 15, 2021, this search warrant was executed at 234 E. Elm Street,

Reading, PA 19607. TREVOR JAY FRANK was present in the residence, along with his mother and girlfriend.

19. During the search, a recorded interview of FRANK was conducted by FBI Task Force Officers Jacob Duncan and Thomas Weaver. During the interview, FRANK advised he used the Instagram username do_it_4_the_money and that he was he was “a little devious” with that account.

20. FRANK was asked about his contact with MINOR and said: “Okay. That I will admit to. I was a shitty person with that age-wise.” He acknowledged he knew MINOR was 15 years old and that he blackmailed her by threatening to send photos of her to her family and friends. FRANK was asked if the photos and videos he requested and received from MINOR showed MINOR in the nude and he responded, “That I’ll admit to.” FRANK further advised that he was engaged in similar conduct with a lot of females he met online.

21. FRANK was also asked about the video he sent to MINOR that depicted a young, minor girl performing oral sex on an adult male. FRANK told the detectives got it from someone on the internet. He said he obtained it from of community that traded that type of material.

CONCLUSION

22. Based upon the information above, I respectfully submit that there is probable cause to believe that TREVOR JAY FRANK, date of birth 09/18/1991, did knowingly use an interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to another person, in violation of Title 18 U.S.C. § 2261A as more

fully set forth in Attachment A. therefore, respectfully requests that the arrest warrant be issued authorizing the arrest of TREVOR JAY FRANK.

s/ Christopher Duncanson

Christopher M. Duncanson
Special Agent
Federal Bureau of Investigation

Sworn and subscribed
before me this 15th day of June 2021.

s/ Marilyn Heffley

HONORABLE MARILYN HEFFLEY
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One – CyberStalking – 18 U.S.C. § 2261A

On or about September 7 through September 8, 2020 , in Berks County, in the Eastern District of Pennsylvania, defendant TREVOR FRANK, did knowingly use an interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to another person, in violation of Title 18 U.S.C. § 2261A.